

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TRUSTEES OF THE PLUMBERS AND GASFITTERS' LOCAL
UNION NO. 12 WELFARE, PENSION, ANNUITY, VACATION
& XMAS AND FRINGE BENEFIT FUNDS; PLUMBERS AND
GASFITTERS LOCAL 12; AND PLUMBERS' UNION NO. 12
LABOR MANAGEMENT COOPERATION TRUST FUND,

Plaintiffs - Creditors

VS.

McGLONE PLUMBING, INC.

Defendant - Debtor

Civil Action No.
05-CV-11510 (PBS)

July 11, 2006

PLAINTIFFS' MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5.3(b), the undersigned, acting as counsel for Plaintiffs in this matter, now moves for the admission of John T. Fussell, Esq. as co-counsel pro hac vice in the above-captioned matter. In support of said Motion, the undersigned states as follows:

1. John T. Fussell is an associate in my firm of Robert M. Cheverie & Associates, P.C., Suite 101, 333 East River Drive, East Hartford, Connecticut, 06108; Tele.# (860) 290-9610. He is a member in good standing of the Bars of the State of Connecticut and the District of Connecticut. He was admitted to the U. S. Court of Appeals for the Second Circuit on December 17, 2001 and to the Supreme Court of the United States of America on April 22, 2002 and is a member of good standing in those Courts as well. See attached Affidavit of John T. Fussell.

ORAL ARGUMENT IS NOT REQUESTED

2. Robert M. Cheverie & Associates, P.C. specializes in the practice of both labor and employee benefits law. As such, Mr. Fussell has developed a longstanding relationship with the Plaintiffs, which would be invaluable during this litigation and at trial. Mr. Fussell has never been disciplined by any Court.

3. The undersigned is a member in good standing of the bar of this Court, and will assume responsibility for the conduct of Mr. Fussell.

Respectfully submitted,

THE PLAINTIFFS,
By Their Attorney



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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TRUSTEES OF THE PLUMBERS AND GASFITTERS'
LOCAL UNION NO. 12 WELFARE, PENSION, ANNUITY,
VACATION & XMAS AND FRINGE BENEFIT FUNDS;
PLUMBERS AND GASFITTERS LOCAL 12; AND
PLUMBERS' UNION NO. 12 LABOR MANAGEMENT
COOPERATION TRUST FUND,

Plaintiffs - Creditors

VS.

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**DECLARATION OF JOHN T. FUSSELL IN SUPPORT
OF MOTION FOR ADMISSION PRO HAC VICE**

I, John T. Fussell, declare and state as follows:

1. I am an associate at the law firm of Robert M. Cheverie & Associates, P.C. in East Hartford, Connecticut, a position that I have held since March of 1996. The firm has an extensive practice in the areas of both labor and employee benefits law. It has represented these types of organizations since its inception.


2. I was admitted to the Bar of the State of Connecticut on March 4, 1996 and to the Bar of the District of Connecticut on September 8, 1997. I was admitted to the U. S. Court of Appeals for the Second Circuit on December 17, 2001 and to the Supreme Court of the United States of America on April 22, 2002. I am a member in good standing in every jurisdiction where I am admitted to practice.

3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction. In addition, I have never been the subject of any disciplinary action by any of the bars to which I am admitted or by any of the courts before which I have appeared.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts and have previously been admitted Pro Hac Vice before this Court.

I affirm under penalty of perjury that the foregoing is true and correct.

DATED this 11th day of July, 2006, at East Hartford, Connecticut.



John T. Fussell, Esq.
ROBERT M. CHEVERIE &
ASSOCIATES, P.C.
Attorneys for the Plaintiffs

SUBSCRIBED and sworn to before me this 11th day of July, 2006.

Karen M. Dauphinais
Notary Public

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing DECLARATION OF JOHN T. FUSSELL IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE has been mailed, first-class and postage prepaid, this 11TH day of July, 2006 to the following:

Daniel T. McGlone, President
McGLONE PLUMBING, INC.
111 French Avenue
Braintree, MA 02184



John T. Fussell, Esq.

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